

WILMERHALE

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Michael G. Bongiorno

Via ECF

+1 212 937 7220 (t)
+1 212 230 8888 (f)
michael.bongiorno@wilmerhale.com

The Hon. Judge Ona T. Wang
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Johnson v. National Securities Corp. et al.*, Case No. 1:19-cv-06197-LTS-OTW

Dear Judge Wang:

Pursuant to Your Honor's order at the telephonic initial case management conference on June 3, 2020, the parties to the above-captioned litigation (the "Parties") hereby submit their seventh joint status report.

While mediation discussions are ongoing, the Parties exchanged responses and objections to their respective requests for document production on September 24, 2020. Pursuant to Rule II.c from Your Honor's *Individual Practices in Civil Cases*, the Parties filed a joint letter on December 22, 2020, explaining the modifications from the Court's model Stipulation and Proposed Protective Order, which the Court entered on December 28, 2020 (Dkt. No. 99). Defendant National Securities Corp. made an initial production of documents on December 30, 2020.

The Parties will file their eighth joint status report in four weeks' time, on January 29, 2021, and will continue filing such reports every four weeks, per Your Honor's order.

Respectfully submitted,

/s/ Michael G. Bongiorno
Michael G. Bongiorno

cc: All counsel of record (via ECF)